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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING
MOTION TO SEAL**

Judge: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

Before the Court is Administrative Motion to Seal Portions of Google LLC's Notice Regarding the August 4 Hearing and Steps Taken to Ensure Compliance with the Preservation Orders ("Notice"). Having considered the Motion and good cause having been found, the Court **ORDERS** as follows:

Document	Text To Be Sealed	Basis for Sealing Portion of Document
Google LLC's Notice Regarding the August 4 Hearing and Steps Taken to Ensure Compliance with the Preservation Orders	GRANTED as to the portions at: Pages 2:4, 2:7, 2:9-10, 2:21, 2:23-24, 2:26-28, 3:2, 3:8, 3:12, 3:15	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Declaration of Glenn Berntson Regarding Google Data Sources Discussed at August 4, 2022 Hearing	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly

1		Pages 1:26-27, 2:3, 2:5-6,	sensitive features of Google's
2		2:8-9, 2:11, 2:14-18,	internal systems and operations,
3		2:20, 2:22-27, 3:4-18,	including various types of Google's
4		3:21-23, 3:26, 4:4-8	internal logs, and their proprietary
5			functionalities, as well as internal
6			metrics, that Google maintains as
7			confidential in the ordinary course
8			of its business and is not generally
9			known to the public or Google's
10			competitors. Such confidential and
11			proprietary information reveals
12			Google's internal strategies, system
13			designs, and business practices for
14			operating and maintaining many of
15			its important services, and falls
16			within the protected scope of the
17			Protective Order entered in this
18			action. <i>See</i> Dkt. 81 at 2-3. Public
19			disclosure of such confidential and
20			proprietary information could affect
21			Google's competitive standing as
22			competitors may alter their systems
23			and practices relating to competing
24			products. It may also place Google
25			at an increased risk of cybersecurity
26			threats, as third parties may seek to
27			use the information to compromise
28			Google's internal practices relating
			to competing products.

SO ORDERED.

DATED: _____

HON. SUSAN VAN KEULEN
United States Magistrate Judge